EXHIBIT 40

DKT NO: X06-UWY-CV186046436-S : COMPLEX LITIGATION DKT

ERICA LAFFERTY : JUDICIAL DISTRICT WATERBURY

v. : AT WATERBURY, CONNECTICUT

ALEX EMRIC JONES : SEPTEMBER 29, 2022

DKT NO: X06-UWY-CV186046437-S

WILLIAM SHERLACH

v.

ALEX EMRIC JONES

DKT NO: X06-UWY-CV186046438-S

WILLIAM SHERLACH

v.

ALEX EMRIC JONES

TRIAL (A.M. SESSION) VOLUME 2

BEFORE THE HONORABLE BARBARA N. BELLIS, JUDGE, AND A JURY

APPEARANCES:

Representing the Plaintiff(s):

ATTORNEY CHRISTOPHER MATTEI ATTORNEY ALINOR STERLING ATTORNEY MATTHEW BLUMENTHAL ATTORNEY JOSHUA KOSKOFF Koskoff, Koskoff & Bieder 350 Fairfield Ave. Ste 501 Bridgeport, Connecticut 06604

ATTORNEY NORMAN PATTIS for Jones Defendants

Recorded By:
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Darlene Orsatti
Court Recording Monitor
400 Grand Street
Waterbury, CT 06702

1	THE COURT: Good morning. Please be seated.
2	Attorney Mattei, did you see what I circled on that?
3	On the instructions?
4	ATTY. MATTEI: Yes. Thank you. You caught it.
5	Thank you.
6	THE COURT: Well, I know you wanted me to read
7	it, but I didn't think you wanted me -
8	ATTY. KOSKOFF: It wasn't misspelled.
9	ATTY. MATTEI: We just had the wrong word in
10	there, Judge Bellis.
11	THE COURT: I wasn't sure.
12	ATTY. KOSKOFF: Long pause dramatic.
13	THE COURT: Okay. Ready for the jury.
14	Do you want to show Attorney Pattis, so he knows
15	what we're talking about. I don't want to have any
16	ex parte communications.
17	ATTY. MATTEI: We said decisions instead of
18	depositions.
19	THE COURT: That's all. So after yesterday when
20	I was taking the afternoon recess in the morning, I
21	did a double take to make sure it wasn't me.
22	ATTY. PATTIS: Well, I guess we all read it and
23	saw what we wanted to see.
24	THE COURT: Exactly.
25	(Jury panel enters the courtroom).
26	THE COURT: Okay. Welcome back. Drawing my
27	count to nine. Please be seated. Make yourselves

comfortable again. And counsel will stipulate that our entire panel has returned. ATTY. KOSKOFF: Yes, your Honor. ATTY. PATTIS: Yes, Judge. THE COURT: All right. Attorney Koskoff, you're calling the next witness. ATTY. KOSKOFF: Thank you, your Honor. Yes. We call Matthew Soto. THE COURT: Good morning. Watch your step there. Just remain standing and Mr. Ferraro will swear you in.

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1
                MATTHEW SOTO, of Stratford,
 2
           Connecticut, having been duly sworn, testified under
           oath as follows:
 3
                THE COURT: And there's water there if you'd
 4
 5
           like any water, you help yourself. And just try to
 6
           keep your voice up if you don't mind, best you can.
 7
           Okay. Whenever you're Attorney Koskoff.
 8
    DIRECT EXAMINATION BY ATTY. KOSKOFF:
 9
           Matthew, thank you for being here. I understand
    we're taking you from the classroom, is that right?
10
11
           Yes.
       A
12
           Can you tell the jury what you do.
13
       Α
           I'm a high school English teacher in Stratford.
14
           Okay. And you had been in class - you've been
15
    teaching class all week?
16
       Α
          Yes.
17
         Okay. And you put in for a day off here.
18
       Α
           Um-hum.
19
          Is that right?
       Q
           Yes, I did.
20
       Α
21
           Okay. And Matthew, first, can you settle a big
22
    mystery in this case, which is what was your date of birth.
2.3
       Α
           July 26, 1997.
           Okay. And so as of December of 2012, that would have
24
25
    made you 15?
26
       Α
           Yes.
27
           And can you tell the jury where you fit in in the
```

whole Soto clan. 1 2 I am the baby. I'm the last of four, and I'm the 3 only boy. 4 All right. You seem to enjoy that. 5 Α I do. 6 From what I can tell. And you - and can you just 7 tell us a little bit about your older sister was Vicki, is that right? 8 9 Α Um-hum. 10 And Carlee and Jillian. Q 11 Α Yes. 12 Q Okay. 13 Vicki was my older sister. She was the oldest. 14 was 12 years older than me when I was born. 15 So there was a significant age difference, but that never 16 got in the way. She was more of like my second mother. 17 All right. And can you just explain to the jury a 18 little bit more about what you mean by that. 19 Vicki always knew she wanted to be a teacher. So if 20 I ever needed help with assignments growing up, she would 21 always help me with those. If I ever wanted someone just to 22 watch a movie with, we would sit and binge the Harry Potter 2.3 movies over and over and over. And then she finally introduced me to the books, which fell in love with as well. 24 25 And what type - did you tell the jury what type of 26 teacher you are? 27 Yeah, I'm a high school English teacher.

Q Okay. I was just making - I thought I heard you say that. Books, was she instrumental - was Vicki instrumental in your interest in becoming an English teacher?

A She definitely was. One of my - the first stories I ever remember was Harry Potter, and I always stuck with it. And the was because I grew up watching the movies with my sister. Before I could read the books, we were watching everything. So I already knew what was going on, so that hooked me to the stories, which is now partially why I'm an English teacher.

Q And what about Carlee and Jillian? Were they also second mothers? I notice you didn't call -

A They weren't necessarily second mothers. Carlee was five years older than me, so we fought a lot growing up. We had the lovely sibling relationship where we kind of just bickered back and forth. And kind of the same thing with Jillian too.

Q Okay. And so - and can you tell us, give us any - do you have any anecdotes or stories that can help the jury understand the relationship that you had with Vicki.

A When I was 13, we were learning about a sled dog - or a dog name Balto in school. And I remember just being fascinated by the story. And Vicki knew that there was a statue of Balto in Central Park. So for Christmas that year, she took me to Central Park, and the probably 20 to 30 degrees we walked all around Central Park trying to find the statue, not knowing how big the park actually was. So it

- 1 took us a few hours, but she didn't stop until we found it,
- 2 because she knew it was a connection from school, that she
- 3 | could also join in on. And she was always wanting to be an
- 4 educator. So anything that she could take from my classroom
- 5 experience to bring it to her, and to bring it to something
- 6 that we could do, she would try to do.
- 7 Q And did she bring the whole family along for that?
- 8 A No, that was just a me and her day.
- 9 Q Was that a special day?
- 10 A It was a very special day.
- 11 Q The and so what year would that been the juries
- 12 heard a lot of course about December of 2012.
- 13 A That was probably 2007, 2008.
- 14 Q Okay. So you would have been about 11?
- 15 A Um-hum.
- 16 Q Is that right?
- 17 A Yes.
- 18 Q And did she do those types of things often with you?
- 19 A Yes. She never really liked buying me gifts. We
- 20 always did experiences instead, because she always wanted to
- 21 | have a full day with me instead of just giving me something
- 22 that would last like an hour or two.
- 23 Q And did you look up to Vicki as a in any way?
- 24 A Yes. Because she was 12 years older, she just had
- 25 everything together. She was the one that was always the
- 26 perfect child. Always the one that never really got into
- 27 | trouble, versus my other sisters. So I kind of followed her

1 example, not necessarily my other sisters' examples. 2 looked up to her for pretty much everything. 3 I just should remind you that your other sisters, I think are in the courtroom. 4 5 Yes, they are. 6 Okay. And - now was there teaching in the family? 7 How did the teaching gene in the family start? My aunt has been a teacher for all of her life. And 8 I think Vicki was slightly - or definitely influenced by my 9 10 aunt. And then influenced by other teachers that she had growing up. She knew she wanted to be a teacher from - I 11 12 don't even know; I was too young to remember back then. 13 Okay. And there came a time when Vicki got her 14 degree and started teaching. Is that right? 15 Α Yes. And we know that she was teaching first grade at 16 Sandy Hook as of December 14, 2012. Can you tell us from 17 18 your experience as her younger brother, much younger, a 19 little bit about how that came to be. How long she had been 20 teaching, and that kind of thing. So she has just graduated from college and was trying 21 22 to find a job somewhere. Being a teacher back then was very 2.3

difficult. So she applied, I believe everywhere across the State of Connecticut, and finally heard something, which was 45 minutes from our house. She gladly accepted a long-term sub position for two years. So she was not in a classroom of her own for two years. She finally on the third year was

24

25

26

1 offered a position, I think the week before school started. 2 So that was a process for the family because she had to set up her classroom. And she had been collecting things for 3 4 years. So it was, let's go in the cubby hole, let's break 5 out everything she had possibly saved. Every book, every 6 little side table, every bookshelf; anything that she knew she was going to put in her classroom one, when she had it. 7 8 So it was us frantically setting up and bringing everything 9 up to Newtown. 10 When you say us - first of all, what year was this, Matthew? 11 12 This would have been 2009, 2010. 13 Okay. The 2009, 2010 school year? 14 School year, yes. 15 Q Okay. So how long - okay. So - and so when you say 16 everybody had to head over to Newtown. Can you just 17 describe that to the jury. 18 It was me, my - I think my sister and cousin Zack, we 19 all went and then there were things that she would bring 20 home to help us. Like if there were things that she had 21 laminated that she needed to cutout. Or any like, little 22 name tag things like that. She would bring home, and it 23 would be the families responsibility. 24 Okay. And so the first - so she had very little 25 advanced notice about this opportunity, and she grabbed it. 26 Yes. I think she was called on either like a

Thursday or Friday, and school started the following week,

- on like a Wednesday or Thursday. So it was less than a week 1 2 that she had to prepare. 3 Did she give you any choice other than to help get 4 her classroom -5 Oh, no. There wasn't really a - there wasn't really 6 a question. It was a, we're all going to set up this 7 weekend, you're coming, right? Okay. And did that become a tradition for you and 8 9 your sister to help set up her classroom? It did. We had gone to her classroom for several 10 Α 11 years after that, and we had helped set up every year. We 12 had gone and helped change bulletin boards. Changed out 13 kids' names for different things. 14 Okay. And so the next year you helped to set up your 15 sisters' classrooms? Um-hum. The next year I can remember cutting out 16 17 letters and her bulletin board said, Chica-Chica Boom-Boom, 18 lot who's knew in our room. And I can remember sitting in 19 the staff faculty room cutting out those letters, when I was 20 probably 13, 14. 21 Okay. And did there come a time - in 2012, did 22 something happen that required all hands-on deck again? 2.3 Α Yes. She had gotten an opportunity to move her 24 classroom. So she was no longer down the hall, she was 25 closer to the front of the building. 26 And when did she - so prior to the calendar year - or
 - prior to the school year starting in the fall of 2012, Vicki

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1
    was able to move her classroom to the classroom that she was
 2
    in on December 14, 2012.
 3
       Α
           Yes.
           And that was closer to the front?
 4
 5
       Α
           Um-hum.
 6
           Okay. And did you help her with that move?
 7
       Α
           Yes.
 8
           Again, any choice in the matter?
 9
       Α
           Oh, no. Not at all. It was a being voluntold
10
    situation.
11
       Q Voluntold.
12
       Α
           Yes.
13
           Oh, I didn't know that was a word.
14
       Α
           Where you're not volunteering, you're just told to do
15
    something.
16
       Q
           Okay.
17
                ATTY. KOSKOFF: I wonder if we could call up
18
           554. This is for ID. There's no objection as I
19
           understand it, and -
20
                ATTY. PATTIS: That's correct, Judge. Was it
21
           554 or 44, sir?
22
                ATTY. KOSKOFF: I believe it's 554. Oh, that's
2.3
           the wrong one. Well, that's also - that's 553, but
24
           we'll show both of these.
25
           This is Vicki - what is going on here?
26
                ATTY. PATTIS: No objection to that one either,
27
           Judge.
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1 This was crazy hair day. So she worked in an elementary school that did Spirit Week quite often. And she 2 was a teacher who went all out. So at 6 o'clock in the 3 morning, she was in the bathroom with a soda bottle and a 4 5 lot of gel, and she maneuvered her hair up to that. And 6 then drove the 45 minutes with her head halfway out the 7 window. 8 Q. Wow. 9 She did anything she could to get a smile from those 10 kids. And she knew that the minute they saw her hair like that, they would just love it. 11 12 And sorry - okay. Q 13 ATTY. KOSKOFF: The - and can we show 544. 14 So this was on Mitch-Match Day. So she had gone in, 15 and I think that's a flamingo, like a button-down robe type 16 of situation, and then a dress on top with some funky 17 legwarmers on the bottom. Bows in her hair. She had every 18 pattern she could possibly have on, just to impress the kids 19 and to make sure that she was dubbed the fun teacher. 20 Because she always wanted to be the fun, cool teacher. Have 21 students look up to her in that way. 22 And did this type of approach, this type of energy to 2.3 teaching, did that also inspire you to become a teacher? 24 It did. Α 25 Are you as fun? Q 26 I try to be. I definitely don't think I can hold a

candle to her, but I try to be with my students.

- Case 23-03037 Document 58-20 Filed in TXSB on 05/12/23 Page 14 of 49 12 1 Okay. Matthew, I have to turn to a sad subject, 2 which is just a little bit about - we can take it down -3 December 14, 2012. I just want to ask you a few questions. 4 And that is. The first question is that weekend coming up, 5 did the family have any plans? And if so, can you tell the 6 jury about those. 7 We did have plans. We, as a family we always loved doing things. And it was around the holiday, so we wanted 8 9 to do something for the holiday, and we had heard that the 10 Yankee Candle Factory in Massachusetts has a huge holiday expo, where they set up a whole bunch of things. So, as a 11 12 family we were planning to go up there for the weekend. 13 And was this an annual pilgrimage, or just something 14 new? 15 Α Just a random family day. And can you tell us about the way that Vicki 16 17 approached holidays. 18 She went all out in terms of Christmas. Christmas, 19 it was probably not even November and she had Michael Bublé
 - A She went all out in terms of Christmas. Christmas, it was probably not even November and she had Michael Bublé blasting, no matter what. It was always his Christmas Album. She was the one that was in charge of picking out our Christmas Tree. Me being the youngest, I always had my opinions, but I never got the tree, because it was always her decision. She was always the one, the first on the mountain looking for the tree. The first one to say, this is the one that we're going home with. Someone else cut it

down now. It was - holidays were always -

20

21

22

23

24

25

26

- Q She had people for that? Is that basically -
- 2 A Yeah, she had her family to cut it down.
- 3 Q Okay.

- 4 A And then I remember it was October of 2011. We had
- 5 | just gotten a nor'easter and she was going back to school on
- 6 that Monday, but she had to get a pumpkin for her classroom,
- 7 because they were doing an activity, and she was panicked
- 8 because there was like a foot of snow on the ground. We had
- 9 just gotten a nor'easter, but she needed a pumpkin, because
- 10 | she told her students that they were going to have one in
- 11 class. And so we trekked out to Jones Pumpkin Patch and in
- 12 | the snow, we had to pick pumpkins for her classroom.
- Q Okay. And so the plan had been on that weekend to
- 14 got to the Yankee what's it called, Yankee Candle Factory?
- 15 A Yankee Candle Factory.
- 16 Q Okay. And we know that those plans obviously
- 17 | changed. Your sisters have brought us through what was
- 18 | going on. If it's okay with you, I'm not going to go into
- 19 detail about that.
- 20 A Um-hum.
- 21 Q But maybe you could just tell us you talked about
- 22 Michael Bublé.
- 23 A Um-hum.
- 24 Q And the spirit. Did there come a time when somebody
- 25 | picked up Vicki's car?
- 26 A Yes. My Uncle Jim was told that her car was still in
- 27 | the lot at Sandy Hook, and that someone had to come pick it

1 And so he volunteered for the task. And when he got in 2 the car, he told us that Michael Bublé was blasting as loud 3 as her radio would have it. And it was the CD that she had. That's the kind of thing when you leave your stereo 4 5 on - stereo car - car stereo on loud. You turn the car off, and then you turn it back on it just - and it was -7 It resumed right where it was playing. 8 Now did there come a time - and again, your sisters 9 really despite whatever misgivings you might have about 10 them. Covered a lot of ground. But, did there come a time when, Matthew, that you became aware of this - of lies that 11 12 were being spread, told, about your family as being actors. 13 As part of a hoax. As part of conspiracy. Things like, 14 your sister never existed. You were actors. So several days, I think it was the weekend after 15 16 Sandy Hook. The President came to Newtown and met with all 17 the families and then had a press conference. Where he said 18 that my sister was a hero. And I remember posting on 19 Facebook, being 15, thinking that I was only posting to my 20 like 30 friends that I had. But somehow the post was shared like 900 times. And it had like 40,000 likes. And going 21 22 through those comments, there was comments on that post 23 saying that I wasn't real. Saying that she wasn't real. 24 And that my family wasn't real. And that was the weekend 25 after. And as a 15-year-old, I had no idea how to process 26 that, or how to deal with that. 27 So when you say likes because some - we have

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1
    different generations in this courtroom. Were they all
 2
    people who were liking things? Or were they -
 3
           No. This was - this was before Facebook had the
       A
    multiple options for the disklike or the hate comment or
 4
 5
    anything like that. So it was them engaging with the post,
 6
    so they can share it to their followers.
 7
           Did you put that post on because you were proud?
           I did. I had no idea where it would go. I thought I
 8
 9
    was only talking to my friends. And I thought I was
10
    expressing how I just felt hearing someone in a very
    powerful position call my sister a hero.
11
12
           Was it comforting to hear the President call your
13
    sister a hero, at a time when I imagine it must have been
14
    terribly - you must be terribly grieving.
15
       A It was.
16
           Was that comforting to you?
17
       Α
          It was.
18
           And did that temporarily at least help you confront
19
    your grief? The President's comments.
20
           It did momentarily.
       Α
           From that moment until today, has that type of thing
21
22
    ever gone away? The type of things that you were exposed
2.3
    to, way back in the - on the day or two after the shooting.
24
                ATTY. PATTIS: Objection. Vaque.
25
                THE COURT: Sustained.
26
           Have you continued, Matthew, for the last nearly ten
27
    years, to receive harassment. Be exposed to the infection
```

of these lies told by Alex Jones. 1 2 Α Yes. 3 ATTY. PATTIS: Objection. Compound. THE COURT: Overruled. 4 5 Yes. Α 6 Has it ever gone away? 7 Α No. Anytime there's another shooting, or anytime someone says something, our social medias are flooded with 8 9 another batch of comments. 10 And if that happens every time there's a shooting, 11 that happens about every six months in America. 12 A little bit more frequently than that. 13 Now can you tell the jury. You were following in your sisters' footsteps, and you pursued an education in 14 15 education. Is that right? 16 Α Um-hum. 17 Can you tell the jury about that. 18 I went to Southern Connecticut State University and 19 pursued a Bachelors in English and Education. For the last 20 few years I graduated two years ago. 21 Okay. And along the way of your education - sorry, 22 how many years total do you have to put in to get that 2.3 degree? 24 A Four to five. 25 Okay. And have you encountered people infected by 26 the Alex Jones lies along the way of your education? 27 ATTY. PATTIS: Objection. Argumentative.

1 ATTY. KOSKOFF: I don't think so, Judge.

2 THE COURT: Overruled.

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2.3

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A Yes. And I would say it started before I even went to college.

Q Can you tell the jury about that?

When I was still in high school - I was 15 when it happened, so I was a sophomore. And I remember going back to school, I believe it was early January of 2013. And I was in the cafeteria, and someone came up to me said, are you real? Is your family real? Did your sister really die? And I can remember just staring at them and not knowing how to respond, because I was at school. I wasn't supposed to be dealing with this here. I was supposed to be amongst friends. Amongst peers. Amongst people in Stratford that knew my sister. Knew that she had walked to the same halls that they're in. Had known that she was real. But this was someone at my school asking something to personal, that they shouldn't have been asking. I remember I went down; I don't even remember what I said to the person. But I went down to my guidance counselor's office, and I sat in his office, and I had a panic attack for hours. And I can just remember him telling me - just trying to distract me about anything in telling me a story how a bear had gotten into his garbage the night before. Just to try to distract me from thinking about the fact that my peers are questioning whether or not my family is real. Whether or not I'm real. And that stayed with me, and I had a very hard time continuing

```
school. I had to spend most of sophomore year and junior
 1
 2
    year home schooled, because I was afraid that something like
 3
    that would happen again.
         How long has your family been in the community of
 4
    Stratford?
 5
 6
       A All our lives.
 7
         Does it date - does it date back to -
       A It dates before Vicki.
 8
 9
           Okay.
       Q
10
           I think my mom and dad settled in Stratford probably
       Α
11
    almost 40 years ago.
12
           Forty.
       Q
13
       Α
           Um-hum.
14
           And you consider Stratford home? Your home?
15
       Α
           Yes.
16
           It's your community, isn't it?
17
           Yes. Yes, it is.
       Α
18
       Q
           And that was your school.
19
       Α
          Um-hum.
20
           Your high school, right?
       Q
21
           Um-hum.
       Α
22
       Q
           Probably should say yes or no.
23
           Yes. It was my high school.
       Α
24
           Had you ever - and this was after Vicki died
       Q
25
    obviously, right?
26
       Α
           Yes.
27
       Q And so you went back to school after Vicki died.
```

```
1
       Α
           Um-hum.
 2
           Yes?
       Q
 3
           Yes.
       Α
 4
           And then this happened.
 5
       Α
           Yes.
 6
           Was this the same year of the shooting, or is it -
 7
           Yes, it was. It was in January of 2013.
 8
           Okay. Was it hard for you to go back to school after
 9
    the shooting?
10
           Yes, it was.
       Α
11
       Q
           Okay.
12
           I was - I've been diagnosed since with PTSD. And I
13
    was fearful of being in a classroom environment after
14
    everything had happened because I was just constantly
15
    waiting for it to happen there.
16
           And when you finally mustered up the courage to go
    back, did you feel comfortable enough to do that.
17
18
           No. I still wasn't comfortable to go back, but I
19
    knew I had to go back at some point.
20
           So you were vulnerable at that time -
21
                ATTY. PATTIS: Objection. Leading.
22
                THE COURT: Sustained.
2.3
                ATTY. KOSKOFF: Withdrawn. Withdrawn.
24
           So that was high school. And at some point, did you
       Q
25
    manage to go back to high school and finish high school?
26
           I did. I went back my senior year and was able to
27
    finish full time.
```

```
1
           Okay. And then you - did there come any other
    instances in your education, in which you were exposed or
 2
    had to confront somebody infected with the Alex Jones lies.
 3
           Yes. When I was in - when I was at Southern, I was
 4
 5
    in a history 101 class. And the first day the professor was
    going over the syllabus, going over what we would be
 7
    covering. And got to the topic of media. And got to the
    topic of current events. And he asked the question, how
 8
 9
    many of you think Sandy Hook actually happened? And I was
10
    sitting in the room. And I had a panic attack immediately,
    because I saw my classmates raise their hand, and not
11
12
    everyone raised their hand. So I knew I was sitting in a
13
    room with people that thought that I wasn't real. That my
14
    sister wasn't real. And I got up and I left. And I dropped
15
    out of that class. And it was a very hard thing for me to
16
    go back to school, even that week.
17
           Was this your first year of college?
18
       Α
           No, this was my second year of college.
19
           Your second year of college. So this would have been
20
    in what year?
21
           2017, 2018.
       Α
22
           And this may seem like a trivial question. In a lot
2.3
    of ways it is. But, did you have to - you had paid for
24
    that?
25
           Yes.
       Α
26
           And did you get reimbursed or on?
       Q
27
       Α
           No.
                It was past the point where I could get
```

reimbursed for the class. I dropped it and lost the money and didn't get credit.

Q But you were able to go back to school and get your degree.

A I was. I was able to take that class over again with a different professor and passed it.

Q Can you describe for the jury how if the exposure of these going on ten years to this kind of - the lies and the people infected by Alex Jones lies, what that's done to you? How do you explain the changes that you've had to - sorry, you kind of tripped me up with this stuff. Can you just explain to the jury whether you've changed, you think, in response to all of this.

A I definitely think that I've changed. At the beginning I didn't know that my words had power. And I saw that with my post. That kind of got a lot of likes and got attention for somewhat the wrong reason. After I saw that, I immediately changed all privacy settings. Immediately hunkered down on all social medias and didn't let that part out into the world. There are still times where if people will ask me about Vicki, I'll deny that I'm her brother. Or I just won't answer because I don't know who they are.

There are times where we have a very - we have a successful 5K that we've been going on for ten years now. And we have a lot of shirts that we have, and they all say her name on it. And I don't like even wearing those shirts out in public anymore, because I don't know who's going to see it

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1
    and who's going to say something to me about it. And I
 2
    don't know if they're going to say something nice, or if
 3
    they're going to be mean about it.
           Has it affected your comfort in meeting new people in
 4
    social situations?
 5
 6
           It has, and especially with me being a teacher, it's
 7
    one of my biggest fears that my students will google me and
 8
    see things like this and bring those questions into the
 9
    classroom.
10
           I think your students are lucky to have you.
11
           Thank you.
       Α
12
                ATTY. KOSKOFF: No further questions.
13
                THE COURT: Cross-examination, Attorney Pattis.
14
                ATTY. PATTIS: Thank you.
15
    CROSS-EXAMINATION BY ATTY. PATTIS:
16
           Good afternoon, Mr. Soto. How are you?
17
       A Good. How are you?
18
       Q
           We met a while ago. I had the chance to take your
19
    deposition.
20
       Α
           Um-hum.
21
           I learned a little bit about the power of your words
    there, didn't I?
22
2.3
       Α
           Yes.
24
           You testified before congress, I believe?
       Q
25
           No.
       Α
26
           In Washington, DC at a rally.
       Q
27
       Α
           Yes.
```

```
Urging gun control.
 1
 2
           Gun violence prevention, yes.
 3
           And with others who had been involved and victimized
       Q.
    by the shooting in Sandy Hook, correct?
 4
           No, this was with Parkland students.
 5
 6
           All right. The Parkland shooting came, and you
 7
    traveled to Washington to show your support -
 8
                ATTY. KOSKOFF: Object, your Honor.
 9
       O - for them.
10
                THE COURT: Just one second. Basis.
11
                ATTY. KOSKOFF: I didn't ask any of these
12
           questions.
13
                ATTY. PATTIS: They're talking about the power
14
           of his words.
15
                THE COURT: I'm going to allow it.
    BY ATTY. PATTIS:
16
17
           The Parkland shooting occurred, correct?
18
       Α
           Yes.
19
           You traveled to Washington, correct?
20
       Α
           Yes.
21
           And when you were there you met with Tommy Murray?
22
       Α
           Yes.
2.3
           And who's Tommy Murray?
       Q
24
           He is someone that grew up in Newtown.
       Α
25
           Did he lose a loved one at Sandy Hook?
       Q
26
       Α
           No.
27
           Who is Jackson Middleton - Middleman?
```

1 Someone else that grew up in Newtown. 2 Did he lose anyone in Sandy Hook? 3 Α No. Okay. But in case, you appeared at a rally, and you 4 spoke on behalf of sensible gun control in fact, correct? 5 6 Α Yes. 7 And that's a position that you acquired as a result of your personal tragedy, correct? 8 9 I don't necessarily think it came from my personal 10 tragedy; I just didn't necessarily express the views 11 beforehand. 12 As you sit here today, do you know whether Mr. Jones 13 has a position on gun violence or gun regulations? 14 Α I do not. 15 ATTY. PATTIS: Nothing further, Judge. 16 THE COURT: Anything further? 17 ATTY. KOSKOFF: No, thank you. Nothing. 18 THE COURT: All right. You may step down. 19 Watch your step. Take your time. 20 (WITNESS STEPS DOWN) 21 THE COURT: Can I see counsel on a sidebar 22 briefly. 2.3 (Sidebar conversation begins). 24 ATTY. MATTEI: I was going to ask for a sidebar 25 as well. 26 THE COURT: Hum? 27 ATTY. MATTEI: I was going to ask for a sidebar

```
1
           as well, but you beat me to it.
 2
                THE COURT: Okay. I didn't know what you wanted
 3
           to do because we have maybe 40 minutes.
                ATTY. MATTEI: I think that will be enough.
 4
 5
                THE COURT: Is that enough time?
 6
                ATTY. MATTEI: Yeah.
                                       The reason I wanted to
 7
           come to sidebar is, because I think given the Courts
           rulings, the sequence in which Attorney Pattis is
 8
 9
           asking these questions is reversed. The only
10
           relevance as I understand it as to this line of
11
           questioning that the Court has considered, is if they
12
           are exaggerating their injuries because they're
13
           biased against Mr. Jones, and if they don't have that
14
           bias against Mr. Jones, you wouldn't - that should be
15
           the -
16
                THE COURT: I agree - so -
17
                ATTY. PATTIS: I don't have to accept their
18
           answer. I could show them - I could go through
           showing them the videos, and so I can kind of -
19
20
                THE COURT: (Inaudible).
21
                ATTY. PATTIS: Yeah, that's what I mean.
22
                THE COURT: (Inaudible) watching them -
2.3
                ATTY. MATTEI: It's okay for now because it's a
24
           (Inaudible) -
25
                THE COURT: I don't think it matters.
26
                ATTY. MATTEI: (Inaudible) - readdress at the
27
           charge -
```

1 THE COURT: All right. So listen, do you have 2 somebody for the next 45 minutes? 3 ATTY. MATTEI: Yeah. Oh, yeah. 4 THE COURT: Do you want to finish up. 5 ATTY. PATTIS: Are you going to be able to 6 finish -7 THE COURT: Can I just ask? What am I telling them for next week? Do we expect them to get the 8 9 case next week? I'm -10 ATTY. PATTIS: Judge, let me switch over here -11 ATTY. KOSKOFF: Oh, by the way. Excuse me one 12 second, Judge and Chris. Would you take the heat for 13 us being not around tomorrow, so that the jury knows 14 it's not the plaintiffs. 15 THE COURT: Sure. 16 ATTY. KOSKOFF: Okay. 17 THE COURT: I'm going to visit my daughter in 18 DC. She's expecting our third grandchild. 19 ATTY. PATTIS: Oh, congratulations. 20 ATTY. MATTEI: That's great. 21 ATTY. KOSKOFF: How long? THE COURT: She's four and a half months. 22 2.3 ATTY. PATTIS: Then what are we doing here? Get 24 the hell out of here. Judge, Attorney Mattei, and 25 Koskoff and I have had some discussions about the 26 case, and they have a lot of strategic decisions to 27 make this week - we will be in touch. Some of their

1 decisions may have (Inaudible) - my recommendations 2 to Mr. Jones and it's conceivable that this case could get to the jury as early as Wednesday if the 3 charge is (Inaudible) - unlikely to be the case. But 4 5 I would imagine that we - unless something 6 extraordinary occurs during Mr. Jones' testimony that 7 requires rebuttal, this should get to the jury Thursday the latest. 8 9 ATTY. MATTEI: I agree. 10 ATTY. PATTIS: For arguments. 11 THE COURT: All right. So I could tell them 12 that we expect that the evidence will be done next 13 week, and that we expect the closing and charge will 14 be next week, likely. And then we'll still -15 ATTY. KOSKOFF: I wouldn't make - I wouldn't 16 want one of us to make our bet on it yet, but 17 certainly we expect the evidence to go to next week. 18 THE COURT: Okay. 19 ATTY. KOSKOFF: I think it's going to happen; 20 you know. 21 THE COURT: Sure. Um-hum. 22 ATTY. MATTEI: Your Honor, just give me one 2.3 second. I just want to - if we finish with this next 24 witness and we have a little time before 1 o'clock, 25 we may be able to squeeze in another deposition 26 video. So I just want to make sure we can go right 27 up to one.

THE COURT: You can go - I would love to go 1 2 right to one. I'm just trying to make it work. 3 ATTY. MATTEI: Okay. All right. 4 (Sidebar conversation ends). 5 THE COURT: So we were just discussing, it looks 6 like we'll be able to present evidence right up to the lunch hour, and then as I said, you'll be excused 7 8 until Tuesday. 9 ATTY. KOSKOFF: Oh, sorry. I forgot where -10 Donna - we call Donna Soto. 11 THE COURT: Very well. Good afternoon. I'm 12 sure you heard me say just watch your step there. 13 Take your time. You brought your own water, but certainly feel free to refill if you need it. 14 15 And if you don't mind standing up and raising your 16 right hand, we'll swear you in. 17 18 19 20 21 22 2.3 24 25 26 27

```
1
                DONNA SOTO, of Fairfield, Connecticut,
 2
           having been duly sworn, testified under oath as
 3
           follows:
 4
                THE COURT: You may inquire.
 5
    DIRECT EXAMINATION BY ATTY. KOSKOFF:
 6
          Hi, Donna.
       Q
 7
          Hi, Josh.
       Α
 8
           Can you tell the jury - did you say your date of
 9
    birth?
10
       A I did not.
11
       Q Do you not want to do that? It's okay.
12
       A 6/23/59.
13
         Okay. And you are the mother of four children as we
14
    understand it?
15
       A Four amazing children. Yes.
16
          Okay. And you were here during - were you here
17
    during all of their testimony?
18
       Α
          Yes.
19
           Okay. And did you take time off of your work to be
    here for their testimony?
20
       A Yes, I did.
21
22
         Can you just tell the jury where you were born and
2.3
    raised?
24
       A I was born and raised in Stratford, Connecticut.
25
          And Stratford's your home.
       Q
26
       A Um-hum.
27
       Q Have you ever left Stratford?
```

- 1 A No.
- 2 Q Never?
- 3 A I've left Stratford. I always lived in Stratford.
- 4 Q You've always lived in Stratford. Okay. Were your
- 5 parents from Connecticut or Stratford?
- 6 A My mother was, my father was from Philadelphia, but
- 7 his grandparents lived here.
- 8 Q In Stratford.
- 9 A In Stratford.
- 10 Q Okay. And can you you have education beyond high
- 11 | school?
- 12 A Yes.
- Q And by the way, did you go to Stratford High School?
- 14 A I did.
- 15 | O Is that what it's called?
- 16 A Yes.
- 17 Q Okay. Is that the high school that Matthew was just
- 18 talking about?
- 19 A Yes.
- 20 Okay. So that was your high school also?
- 21 A High school both my parents went to, and all my
- 22 children.
- 23 Q Okay. And after you went to Stratford High School,
- 24 can you tell the jury what you did?
- 25 A I first became a licensed practical nurse. I then
- 26 | became a registered nurse and I have my Bachelor of Science
- 27 | in Nursing. And I work at a local hospital as a nurse case

```
1
    manager supervisor.
 2
       Q
           Currently.
 3
           Currently.
       A
           And is it your preference not to say the name of the
 4
 5
    name of the hospital?
           I work at Bridgeport Hospital.
 6
           Okay. And for how long have you been at Bridgeport
 7
    Hospital?
 8
 9
           Since 1977.
       Α
10
           Wow.
       Q
           The year I graduated high school I started there as a
11
       Α
12
    nurse's aide, and went through the ranks, and now I'm a
13
    supervisor of the case management department.
14
           Okay. And in terms of your - are you full time and
15
    been full time since you -
16
           I've been full time my entire career.
       Α
           In addition to raising your four children?
17
18
       A
           Yes.
19
           Okay. And are you - you were married. You're
    divorced.
20
21
       Α
          Yes.
22
           And can you tell the jury a little bit about - we saw
23
    some pictures of your daughter Vicki. Can you just tell the
24
    jury a little bit about Vicki and give us more of a sense of
25
    who she was.
26
           She was a very special person. When I was pregnant
27
    with Vicki, I knew she was a girl. You know, back then you
```

1 didn't have ultrasounds and you didn't get to find out 2 beforehand, but I just knew she was a girl. Q How? 3 4 I just knew. Mother's intuition, I quess. I just 5 knew she was girl. And I wanted a girl so badly. 6 Well, you hit the jackpot, because you got a lot of 7 them. I did. I did. And she was just the perfect little 8 9 angel when she was born. Her sister was born three years 10 But Vicki was always, and my kids will say it, the 11 perfect child. She never got into trouble. She was - she 12 was always responsible. I know - you know, there's things 13 she did that I didn't know about I'm sure, as she got older. 14 But I always called her - or she always called herself the 15 perfect child. She always told me I should have stopped 16 after one. She was - she had that kind of relationship with 17 her brother and sisters that, you know, you should have 18 stopped at one mom. But her and I, we had a close 19 relationship. I cried my eyes out when she went to college. 20 When my second went to college, I was happy that she went 21 to college. Wow, this is getting -22 2.3 But, when Vicki was 15, her and I took a trip to 24 Italy. Our hospital used to offer these trips at a 25 discounted rate, and Vicki and I went to Italy for about ten 26 days, and she was 15 at the time. And Italy is, you know, a

lot historic buildings. We went to the Vatican; we had an

1 audience with the Pope. And she was less than interested in 2 a lot of it. I don't know if I should say this, but I think 3 she saw more naked men on that trip because of the statutes 4 in Italy that are just all over the place. And she was only 5 15. 6 Did she have a lot of questions or a lot of answers? Yeah. She had a lot of questions. And she - I 7 8 remember we were somewhere in Italy and some boy was calling to her, Bella - Bella, because she was just such a pretty 9 girl. And I treasure those memories that I have. 10 So we know she, she as the oldest she set the bar 11 Q. 12 pretty high it sounds like on education and things like 13 that. 14 Oh, she certainly did. She knew she wanted to be a 15 teacher since she was three. She looked up to her aunt, who 16 she was very close with. She was the first grandchild -17 first granddaughter. And my sister and I were very close, 18 and she really looked up to her Aunt Debbie, who was a 19 teacher. She always knew she wanted to be a teacher. 20 collected books. She went off to Eastern State College in 21 Willimantic, which is a liberal arts college. She excelled 22 there. She got a dual major. And you know, to the time -23 up until the time she died, she always would tell her 24 siblings that she has two degrees and nobody else can match 25 that. And nobody else has. And we heard about - we saw a picture of some crazy 26

hair, and also some less crazy hair.

A Um-hum.

1

2

3

4

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7

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9

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17

18

19

20

21

22

23

24

25

26

27

Q But can you tell us about what your - what that's all about.

That was so Vicki. And of note, all my four children lived at home at the time of the shooting. They all lived with me in the house that they grew up in. But in addition to those two pictures, I think - I don't know what day it was. Erica Lafferty might remember. But she wore her prom dress, which was a big, huge poofy pink dress. And she wore the skirt to school for one of those days. And she loved being a teacher. She loved her kids. We would sit on the patio, as my son said, and cut out letters. We'd help her with her papers, and she would just talk about each of the kids and how much - there were some that probably drove her crazy, and she would tell us about that too. But she loved, loved being a teacher. She told us once she had mentioned in class that she lives at Target. And one little boy came up to her and said, you live at Target? And she was kind of just saying that she goes there all the time. But I think the love was very mutual with her students. And to this day, the graduating class in Newtown this year all had Vicki. And they sent me a picture of the kids that graduated this year, that were in her class. When she was a first year first grade teacher. So it would have been 2009-10 school year. And they graduated this year. And another teacher from Sandy Hook got them all together and took a picture and sent it to me.

- Q After the shooting I'm not going to ask you about just that weekend, that Friday. But I need to ask you some questions.
 - A Um-hum.

1

2

3

4

5

6

7

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9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

Q Just a few about your exposure. Or give us an example of - first of all, did there come a time when you became targeted, or your family became targeted by people infected with these lies of Alex Jones.

Yes. Very early on, and now when I think back, Vicki's wake was held in Stratford, and there was more than 4,000 people that came to the wake. It lasted hours, and hours, and hours after it was supposed to. And the lines were just wrapped around the blocks. And you know, we had people that were canvassing the people that were there, just to make sure nobody was taking pictures. We had security, that I hadn't thought about. My cousin thought about having security there. And I remember the day she was buried on the 19th. We were - me and my children were in the limousine, and we were pulling out of the driveway, and there was a man taking pictures. And I remember like just my motherly instinct I guess, I just wanted to get out of that limousine and go after him. And somebody did go after him. And you know, it was very disheartening that as other parents have said, when you're trying to grieve. This was such a public tragedy; we couldn't grieve on our own. there was cameras all over the church - or they weren't on the lawn of the church, they weren't allowed. But people

1 allowed them on their grass near our church. And shortly 2 after that is when we were - it was brought to our attention 3 that there was fake Facebook pages in Vicki's name. And 4 they were all fake. They were all people that questioned if 5 she had lived. If we were real. If we were actors. 6 of them had profile pictures that were like with Halloween 7 masks on. Those white Halloween masks. And we started 8 getting the comments on Facebook. We had a memorial page 9 set up for her because we have a memorial. And we would get 10 the comments constantly. And you know, I remember I was up at night, and just reading through these comments. And one 11 12 night a friend, or one night somebody messaged me and she 13 seemed like a really kind person, and said, do you need help 14 with this social media? And I said - and I don't know why I 15 - you're in shock for so long afterwards, I don't know why 16 but I said yes. And it turns out now she's a very good 17 friend of ours. She's been in the courtroom a couple times. 18 And she helped me and our family get all these pages. There 19 was 25 Facebook pages with Vicki's name on it with lies. 20 Just hoaxsters and just lies about Vicki, our foundation, 21 our family. They had family pictures that I had taken of my 22 kids that they questioned every piece. You know, why is his 23 leg going that way? Why is her hair going this way? They 24 just tore apart these pictures, and they were all online. 25 And Ryan, is her name, and she helped us get all these 25 26 pages down.

27 Q Okay.

```
1
           Facebook did remove every single one of them.
 2
    still have a memorial page for Vicki that we monitor very
    closely. Ryan is an administrator, and she monitors, my son
 3
    monitors it. Just last Sunday we had a man come on and say,
 4
 5
    haven't you made enough off these dead kids yet? And that
 6
    was last Sunday. So, it's almost ten years now, and we're
 7
    still getting these messages. And we get them often. We
    have filters and Ryan catches them pretty quick, so I don't
 8
 9
    see them anymore. But early on there was just hundreds of
10
    comments and -
           How - these Facebook pages that sprung up or came out
11
12
    of these lies. How quickly did that seem to happen? Was
13
    that -
14
       A Oh, well I met Ryan early January. So 2013. So it
15
    was very quick.
16
           So by January of 2013 there were at least 25 of these
17
    different -
18
       A
          Yes.
19
           And did each of these sites have, I don't know what
20
    they call them - followers or -
21
           Oh, yes. They had followers. They had - they're
22
    called friends I guess, and the comments just were never
2.3
    ending.
24
           You mentioned the - I want to give you a chance to
25
    talk about the foundation. We've talked - the jury's heard
26
    a lot about the foundation. They heard about what's
27
    happened at the foundation. But they've also heard a little
```

bit about the good the foundation does. And I was wondering 1 2 if you could describe just generally first what it is, and then we'll show the website. Okay. 3 We have - when we wrote Vicki's obituary, we were 4 5 advised to put donations to something. So we put donations 6 to the Vicki Soto Memorial Fund, and we hadn't even 7 established it yet. But shortly thereafter we did 8 establish - it's a nonprofit and we focus on education. 9 Vicki was huge into education, and she was a lover of books. 10 She just - she collected books for Easter and Christmas, and her birthday. And she unmasked this huge library, and she 11 12 was so proud of that library that she had in school. One of 13 our big regrets was, we never got any of her library back. 14 They were all contaminated with obviously blood from the 15 shooting. So we never got any of her books back. And that 16 really tore us up in the beginning. But our foundation 17 started by giving our two local high schools seniors that 18 were going into the field of education, a \$5,000 19 scholarship. We did our Stratford High and Bunnell High, 20 which are the two high schools in Stratford. And then the 21 next year we branched out - or I think it was two years we 22 branched out, and we gave a Connecticut recipient and a 23 national recipient. So we give four \$5,000 scholarships 24 every year. And they're renewal for the entire four years 25 of their college, if they're in good standing. Which they all are because my children and I, and other members of our 26 27 family select the recipients. And we look for people that -

1 I can't think of the word - that remind us of Vicki and the 2 qualities she had, and the passion she had, and the love for 3 life she had. So we pick such perfect candidates. And we 4 have people that - we have many that are now teachers that 5 send us pictures in their classroom. And I was texting one 6 of them last night, she lives in Florida. Just to make sure 7 she was okay. She was going through the hurricane. So, you know, we do that. We renew those for four years. We also 8 9 have Ms. Soto's Literacy Legacy. Where we do mentor books 10 multiple times a year to our local K through 6 schools. we purchase books, and we give one to each teacher in 11 12 Stratford. And they do projects around that book with the 13 students. They do bulletin boards, or I know they've done rock gardens outside of schools. We have bookcases that we 14 15 have purchased and put in every school in Stratford. And we fill those with books - free books for kids to take. 16 And we 17 have book drives, I think one of my children mentioned book 18 drives. We have people donate books, and we have people 19 come - teachers come and take books from our office. 20 our last book drive we had over 200 teachers come, and just 21 fill bags for their classroom library. And we just - I think we said it this last time. Vicki would have been in 22 23 line. And when we pulled up to our office that day, there 24 was already a line across our office waiting to get in. And 25 we said, Vicki would have been the first one there to get 26 books for her classroom. So we just know - we're honoring 27 her in such a good way.

```
Aren't you bringing this - aren't you exaggerating
 1
 2
    your injuries because you want to go after everybody's guns?
 3
       Α
           No.
           Are you sure?
 4
 5
       Α
           Yes.
           That's what we heard.
 6
       Q.
 7
                ATTY. KOSKOFF: Can we bring up the Vicki Soto
 8
           Memorial page. The foundation. I'm sorry. This is
 9
           555, 556.
10
                THE CLERK: Those aren't yet full exhibits.
11
                ATTY. KOSKOFF: Yeah, I think they're by
12
           agreement though.
13
                ATTY. PATTIS: By agreement, they are. Yes.
14
                THE CLERK: Okay.
15
                ATTY. KOSKOFF: Sorry - excuse me Attorney
16
           Ferraro, sorry. It's 555 through 558. These will be
17
           PDF's of just the website that we show. Okay.
18
    BY ATTY. KOSKOFF:
19
           So this is the landing page? Is that what they call
20
    it?
21
           Yes.
       Α
22
           Very colorful. And this is - it's showing actually
2.3
    the date coming up is 11/5/22.
24
           Yes. That's our 5K.
       Α
25
           All right. And that's the big fundraising event of
26
    the year?
27
       Α
           Yes.
```

```
1
           All right. Do you have to run or can you also kind
    of walk quickly?
 2
 3
           You can walk.
 4
       Q
           Okay.
 5
           There's many people that walk.
 6
       0
           Okay. Just in case.
 7
                ATTY. KOSKOFF: And can you blow up the bottom
           part of that. All right.
 8
 9
           So this is a place for folks to donate?
10
       Α
           Yes.
11
                ATTY. KOSKOFF: I'd ask to go back and just -
12
           And we could just hit - you talked about your
13
    mission, so just click on the mission - and this lays out -
14
    mission of the Vicki is outlined in the following
15
    fundamental principles to honor her courage of love of
16
    education, by supporting teacher led initiatives and
    educator driven programs. Lead and implement vital literary
17
18
    needs in our local community and our state. Enrich student
19
    and youth organizations to foster reading, writing,
20
    education, and teaching opportunities. Support future
    educators' potential by awarding four prestigious - which we
21
22
    were talking about - scholarships annually. And then it
2.3
    talks about the donations. I didn't see anywhere there that
24
    says, five, take away everybody's guns. Is that on there?
25
       Α
           No.
26
       Q
           Okay.
27
                ATTY. KOSKOFF: Now can you go to the next - can
```

```
1
           you back up for a second and go to the last picture.
 2
           I'm not going to read all this. A, because I can't,
    and B, because you've spoken so lovely about her legacy.
 3
 4
                ATTY. PATTIS: Objection, Judge.
 5
                ATTY. KOSKOFF: I'll withdraw that.
 6
           Does this describe more of what you were just
 7
    explaining to the jury about who she was?
           Um-hum. Yes. And we do a lot more than I said.
 8
 9
    We - our local YMCA and library, we spend a lot and donate
10
    books to them. We're always looking for teachers that need
    books on donors choose. So our fund is all around education
11
12
    and literacy locally and nationally.
13
           Okay. I need to ask you some questions that are
14
    going to sound very technical and are technical. But so I
15
    hope you bear with me. As a result of the encounters that
16
    you've had with folks infected by the lies of Alex Jones,
17
    have you had to increase some security around your house?
18
           We have security cameras around the perimeters of our
19
    house, yes.
20
           And did that - that obviously cost money. They
    weren't donated.
21
22
           They were not donated. Yes, it does cost money, and
2.3
    there's a month cost to it as well.
24
           Okay. And in terms of your - we heard from Jillian
25
    that she was anxious about people who were infected by Jones
26
    lies. And I want to ask you. Did there come a time that
27
    you're aware of that Jillian had to drop out of a class?
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1 Α Yes. 2 And did she have to forfeit the tuition as a result? 3 Yes, she did. Α And is it your understanding that she dropped out as 4 5 a result of her anxiety about being confronted by these 6 people? 7 A Yes. 8 Okay. Same question for Carlee. In fact, did 9 Carlee - first of all, let me slow down a little bit. I 10 know we're running out of time. But, did there come a time 11 when you became aware that Carlee was so afraid of 12 encountering people infected by Jones lies, that she also 13 dropped out, but for an entire semester? 14 Α Um-hum. Yes. 15 And did she have to forfeit money as well? 16 Α Yes. 17 Thank you. No further questions. 18 THE COURT: Attorney Pattis. 19 CROSS-EXAMINATION BY ATTY. PATTIS: 20 Mr. Koskoff asked you some questions about quns. 21 invited you to the White House press conference on gun 22 control? A We were invited on behalf of the President. 2.3 And that was probably one of four times you met with 24 25 the President, correct? 26 A I believe so. 27 ATTY. PATTIS: Nothing further, Judge.

1 THE COURT: Anything further? 2 ATTY. KOSKOFF: Nothing further. 3 THE COURT: You may step down. Take your time 4 and watch your step. 5 THE WITNESS: Thank you. 6 (WITNESS STEPS DOWN) 7 ATTY. MATTEI: Your Honor, we're going to play the deposition testimony of David Jones. 8 9 THE COURT: And my earlier instructions about 10 viewing deposition testimony, of course applies. (Video deposition of David Jones played for the jury). 11 12 ATTY. MATTEI: Your Honor, that concludes David 13 Jones' testimony and our presentation today. 14 THE COURT: All right. So, I want to just give 15 you some information. First of all the lawyers asked 16 me to tell you and I agreed to. That the reason that 17 you have tomorrow off is not because of them, it's 18 because I'm taking a rare day off. So don't blame 19 the lawyers, you can blame me. It looks like that the evidence will conclude 20 next week. So we continue to track ahead of 21 22 schedule. Everything to the credit of the lawyers, 2.3 everything has been moving really as efficiently as 24 one ever sees in a trial. So to their credit, we 25 are - we remain head of schedule. 26 We now are going to have four and a half days 27 off before we see you again. That's a long time.

1 And so it becomes so very important for all of us 2 that you continue to obey the rules of juror conduct 3 and you continue to make all reasonable efforts to avoid any and all media coverage, directly or 4 5 indirectly about this case. You've come so far, so 6 hopefully we can avoid any problems. But again, I 7 implore you that if you do encounter anything that 8 concerns you, please let Ron know in a written note 9 and we are prepared to deal with it. So don't have 10 any hesitancy at all about letting Ron know, so that 11 we can deal with it on the spot. 12 With that, I hope you all enjoy the rest of the 13 afternoon. The long weekend. And we will see you on 14 Tuesday for our normal 10 a.m. start. And thank you 15 very much. Ron, you'll collect the notebooks. 16 THE CLERK: Yes, your Honor. 17 THE COURT: All right. And we are adjourned for 18 the day. (Adjourned) 19 20 21 22 2.3 24 25 26 27

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DKT NO: X06-UWY-CV186046436-S : COMPLEX LITIGATION DKT

ERICA LAFFERTY : JUDICIAL DISTRICT WATERBURY

v. : AT WATERBURY, CONNECTICUT

ALEX EMRIC JONES : SEPTEMBER 29, 2022

DKT NO: X06-UWY-CV186046437-S

WILLIAM SHERLACH

v.

ALEX EMRIC JONES

DKT NO: X06-UWY-CV186046438-S

WILLIAM SHERLACH

v.

ALEX EMRIC JONES

CERTIFICATION

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, G.A. #4, Waterbury, Connecticut, before the Honorable Barbara Bellis, Judge, on the 29th day of September, 2022.

Dated this 30^{th} day of September, 2022 in Waterbury, Connecticut.

Darlene Orsatti

Court Recording Monitor

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